



Accredited Certifiers Association, Inc.

*Accredited certifying agents working together to ensure
the integrity of organic certification in the United States*

June 8, 2017

Dr. Paul Lewis, Ph.D., Director
Standards Division, National Organic Program
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2646-So., Ag Stop 0268
Washington, DC 20250-0268

Re: AMS-NOP-17-0031; NOP-15-06A Organic Livestock and Poultry Practices Second
Proposed Rule

Dear Dr. Lewis:

Thank you for the opportunity to provide comments regarding the Organic Livestock and Poultry Practices (OLPP) Second Proposed Rule. The Accredited Certifiers Association (ACA) is a non-profit educational organization, and our membership includes 53 USDA Accredited Certification Agents. An ACA Working Group focused on best practices related to implementation of the OLPP Rule was convened earlier this spring. Members of this group, along with the ACA Board of Directors, developed these comments, which are also informed by conversation with the general ACA membership.

The instructions in this docket ask for public comments related to four actions being considered with regard to the Final Rule. **We request that the first option is acted upon: “Let the rule become effective. This means the rule would become effective on November 14, 2017.”**

As the ACA noted in a letter recently submitted to Sonny Perdue, US Secretary of Agriculture (attached), the OLPP rulemaking was an enormous undertaking, incorporating feedback from thousands of public comments and expertise from a wide variety of relevant government agencies. These efforts resulted in a Final Rule that balances the complexities of commercial scale farming with the expectations of organic consumers, as articulated in a separate recent letter to Perdue, which was signed by 334 organic livestock farmers on April 28, 2017 and submitted to this docket by the Organic Trade Association on their behalf.

The same group of farmers also noted that the NOP regulations are completely voluntary and are, at their core, a marketing mechanism. No one is required to abide by the National Organic Standards unless they choose to do so. This marketing opportunity provides producers with a greater number of options to remain competitive on their farms – or to viably enter into farming – while providing consumers options with regard to the purchases they make. However,

customers will lose faith in a label that is not consistently enforced. The OLPP provides the necessary framework for consistent application by producers and certifiers, and that is why it is so critical to the National Organic Program.

In conclusion, we ask you to consider that rural communities and the US agricultural economy have benefited strongly from the National Organic Program. The strength of the program depends on fairness and consistency in how the rule is applied. The ACA stands in strong support of the OLPP because it will make significant gains in bringing about that fairness and consistency. It is also worth noting that accredited certification agencies have put considerable work into planning for the implementation of this rule. A state of delay lends to difficulty with regard to training and implementation since it leaves paperwork, policies, and procedures all up in the air. For this reason, in addition to those already noted, we ask that the rule become effective on November 14, 2017, without further delay.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jennifer Cruse".

Jennifer Cruse
Coordinator, Accredited Certifiers Association